

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

A.C., an individual,

Plaintiff,

RED ROOF INNS, INC. *et al.*

Defendants.

CIVIL ACTION NO. 2:19-CV-04965-ALM-EPD

Chief Judge Algernon L. Marbley

Chief Magistrate Judge Elizabeth A. Preston Deavers

JOINT NOTICE OF STIPULATED DISMISSAL WITHOUT PREJUDICE

Come now the parties, by and through counsel, and jointly stipulate to dismissal of all claims of Plaintiff against Defendants without prejudice pursuant to Fed. R. Civ. Pro. 41(a)(1)(A)(ii). Each party hereby stipulates and agrees that each party will bear its own costs.

Dated: September 20, 2021

Respectfully submitted,

/s/ Steven C. Babin, Jr.

Steven C. Babin, Jr. (0093584)

BABIN LAW, LLC

22 E. Gay Street, Suite 200

Columbus, Ohio 43215

T: 614.761.8800

Email: steven.babin@babinlaws.com

/s/ Sara M. Turner

Sara M. Turner (*pro hac vice*)

BAKER, DONELSON, BEARMAN

BEARMAN, CALDWELL &

BERKOWITZ, PC

420 20th Street North, Suite 1400

Birmingham, AL 35203

T: 205.250.8316

E: smtturner@bakerdonelson.com

/s/ Tiffany R. Ellis

Tiffany R. Ellis

Weitz & Luxenberg, P.C.

3011 W. Grand Blvd.

Detroit, MI 48202

E: tellis@weitzlux.com

Attorneys for the Plaintiff

Jennifer Snyder Heis (0076181)

ULMER & BERNE LLP

600 Vine Street, Suite 2800

Cincinnati, OH 45202

(513) 698-5058

jheis@ulmer.com

Alyson Terrell (0082271)
ULMER & BERNE LLP
65 East State Street, Suite 1100
Columbus, Ohio 43215
(614) 229-0042
(614) 229-0043 FAX
aterrell@ulmer.com

Attorney for Defendant
Choice Hotels International, Inc.

/s/ Christopher B. Donovan
Christopher B. Donovan (*pro hac vice*)
DLA Piper LLP (US)
1000 Louisiana Street, Suite 2800
Houston, Texas 77002
713.425.8449
christopher.b.donovan@dlapiper.com

Michael R. Reed (0063995)
Elisé K Yarnell (0093996)
Hahn Loeser & Parks LLP
65 East State Street, Suite 1400
Columbus, Ohio 43215
(614) 233-5165
mreed@hahnlaw.com
eyarnell@hahnlaw.com

David S. Sager (*pro hac vice*)
DLA Piper LLP (US)
51 John F. Kennedy Parkway, Suite 120
Short Hills, New Jersey 07078-2704
973.520.2550
david.sager@dlapiper.com

Attorneys for Defendant
Wyndham Hotels & Resorts Inc.

/s/ Katherine L. Kennedy
Katherine L. Kennedy (0079566)
LEWIS, BRISBOIS, BISGAARD &
SMITH
250 E. 5th Street, Suite 2000

Cincinnati, Ohio 45202
kate.kennedy@lewisbrisbois.com
(513) 808-9914 / (513) 808-9912 (Fax)

Attorney for Defendant
Red Roof Inns, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2021, I electronically filed the foregoing JOINT NOTICE OF STIPULATED DISMISSAL WITHOUT PREJUDICE with the Clerk of the Court using the CM/ECF system for service of all parties.

/s/ Steven C. Babin, Jr.
Steven C. Babin, Jr.